

LAW OFFICES
MORGAN, LEWIS & BOCKIUS LLP
101 PARK AVENUE
NEW YORK, NEW YORK 10178
(212) 309-6000
ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRUCE DUNN, MICHAEL WEISSMAN AND
JAMES VERRASTER,

Plaintiffs,

-against-

STANDARD BANK LONDON LTD., AND
STANDARD INTERNATIONAL HOLDINGS,

Defendants.

Index No. 05 CV 2749

Electronically Filed

Oral Argument Requested

**DEFENDANTS' NOTICE OF
CROSS-MOTION AND CROSS-MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Defendants Standard Bank London Ltd. ("Standard Bank London"), and Standard International Holdings ("Standard International") (collectively, "Defendants") pursuant to Rule 56 of the Federal Rules of Civil Procedure and in accordance with the May 15, 2006 Court Order, and upon: (1) the accompanying Memorandum of Law in Support of Defendants' Cross-Motion for Summary Judgment; (2) Local Rule 56.1 Statement of Undisputed Material Facts in Support of Defendants' Cross-Motion for Summary Judgment; (3) the Affidavit of Albert Maartens; (4) the Supplemental Affidavit of Albert Maartens; and (5) the Affidavit of Maral N. Kazanjian and the attached exhibits, will move this Court, before the Honorable Denise Cote, in the United States District Court, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 11B, New York, NY, 10007, on a date and at a time to be designated by the Court, for an Order: (i) granting

Defendants' cross-motion for summary judgment; and (ii) awarding Defendants all costs and attorneys' fees incurred in connection with the instant action and this motion.

MOTION

Plaintiffs Bruce Dunn, Michael Weissman and James Verraster (collectively "Plaintiffs") filed an action alleging violations of Article 6 of the New York Labor Law, breach of contract, unjust enrichment, and conversion. Defendants cross-move for summary judgment on all claims contained in the Second Amended Complaint because Plaintiffs have failed to raise a genuine issue of material fact concerning the sole remaining issue before this court – the principal place of business of Standard New York and because Defendants' are entitled to summary judgment as a matter of law.

Dated: May 26, 2006
New York, New York

MORGAN, LEWIS & BOCKIUS LLP

By: Maral Kazanjian
Debra Morway (DM-2629)
Maral N. Kazanjian (MK-0906)

101 Park Avenue
New York, New York 10178
(212) 309-6000

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